

REMARKS/ARGUMENTS

Favorable reconsideration of this application in view of the above amendments and in light of the following discussion is respectfully requested.

Claims 1-10, 12, 13, 15, 17-28, and 33-44 are pending. The present Response amends Claims 1, 19, 23 and 33. No new matter is introduced..

The Office Action rejected Claims 1, 2, 4, 5, 7, 8, 10, 12, 13, 15, 17, 18, 23, 26-28, 33, 34 36-38 and 40-44 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent 6,990,238 to Saffer et al. (herein “Saffer”) in view of Xia Lin, et al., “A Self-Organizing Semantic Map ...” (herein “Lin”) and screen shots from the website <http://docstore.mik.ua/orelly/networking/puis/index.htm> (hereinafter, “the UNIX screenshots”); rejected Claims 3, 6, 9, 19, 20, 24, 25, 35 and 39 under 35 U.S.C. § 103(a) as unpatentable over Saffer in view of Lin, the UNIX screenshots and U.S. Patent No. 6,446,061 to Doerre et al. (herein “Doerre”); and rejected of Claims 21 and 22 under 35 U.S.C. § 103(a) as unpatentable over Saffer in view of Lin, the UNIX screenshots, Doerre, and U.S. Patent 5,977,992 to Branscomb.

Initially, it is noted the rejection of Claims 1, 23, 33, 34, 36-38 and 40-44 is improperly expressed in the Office Action. M.P.E.P. § 707.07(d) states “A plurality of claims should never be grouped together in a common rejection, unless that rejection is equally applicable to all claims in the group.” In the present case, the Office Action groups Claims 1, 23, 33, 34, 36-38 and 40-44 together, but fails to explain how the Examiner believes several of the limitations in Claims 42-44 are met by the cited references. For example, there is no indication in the Office Action that the Examiner has considered the recitation of (emphasis added) “each of the direction indicating symbols indicating a relative

array direction in the first display area from the one of the second hierarchical clusters to a corresponding one of the other second hierarchical clusters” in each of Claims 42-44. Indeed, as noted in M.P.E.P. 2143.03 “All words in a claim must be considered in judging the patentability of that claim against the prior art.” (*quoting In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). The rejections in the Office Action represent a clear disregard for this well established standard for determining the patentability of a claim.

Accordingly, should a future Office Action be issued that rejects the pending claims, it is respectfully requests the Examiner provide a complete explanation as to how the cited references are being applied, as is required by 37 C.F.R. § 1.104(c)(2). (“When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.”) 37 C.F.R. § 1.104(c)(2). See also M.P.E.P. § 707.

It is respectfully requested the rejections based on the UNIX website be withdrawn. As noted in the previously filed Response, the UNIX website fails to disclose or suggest an apparatus in which, when viewing a first cluster in one of the hierarchical levels within the display area of the graphical display, the display processor is operable to generate data which is displayed as a direction indicating symbol on the graphical user interface providing a user with a relative direction within the n-dimensional display of the location of a second cluster within a same hierarchical level as the first cluster, as previously recited in Claims 1. Nor does the UNIX website disclose or suggest a configuration in which each of the direction indicating symbols indicates a relative array direction in the first display area from the one of

the second hierarchical clusters to a corresponding one of the other second hierarchical clusters, as recited in Claims 41-44.

In particular, the Office Action points to the “NEXT” and “PREVIOUS” graphics illustrated in Figure 3 of the UNIX screenshots provided with the Office Action, and asserts the UNIX screenshots disclose a direction indicating symbol providing the user with a second cluster within a same hierarchical level as the first cluster, the second cluster being located outside the display area.

The “NEXT” and “PREVIOUS” symbols on the UNIX website do not specify a spatial direction, but merely provide a link to different pages of content within a specified order of pages of content.

Nevertheless, the Office Action states, at page 17:

...within the UNIX screenshots the "NEXT" and "PREVIOUS" graphics/buttons 1) have arrows associated with the words to show the direction in which the different chapter clusters are in relation to one another. For example, the "NEXT" graphic has an arrow pointed within the right direction which indicates upcoming chapter cluster, and the "PREVIOUS" graphic has an arrow pointed within the left direction indicating a prior chapter cluster. Lastly, the "NEXT" and "PREVIOUS" graphics are also associated with the label (i.e. name) of the next or previous cluster, thus allowing the user to be aware of the forthcoming. As a result, the examiner believes the UNIX screenshots to fully/clearly read upon the claim language as currently presented.

However, different pages of a website do not correspond to clusters of information at a same hierarchical level. In order to clarify this distinction, amended Claims 1, 19, 23 and 33 further specify that the direction indicating symbol on the graphical user interface provides a user with a relative direction within the n dimensional display of the location of a second cluster within a same hierarchical level of the n-dimensional display.

Indeed, there is no way that different pages can be considered to be on the same hierarchical level on the n-dimensional display because the two clusters of information (i.e. the pages of content) never simultaneously exist on the same display.

Accordingly, for at least the above noted reasons, even the combined teachings of the cited references fail to disclose or suggest all of the features recited in Claims 1, 19, 23, 33 or 42-44. It is submitted Claims 19, 23, 33 and 42-44, and the claims depending therefrom, are in condition for allowance.

For the reasons discussed above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance for Claims 1-10, 12, 13, 15, 17-28, and 33-44 is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

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